

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

In re:

CSR-OK Real Estate Holding Company,
LLC,

Case No. [23-80390](#)
Chapter 11 Sub V

Debtor.

**APPLICATION FOR AUTHORITY TO EMPLOY
COUNSEL FOR DEBTORS IN POSSESSION**

CSR-OK Real Estate Holding Company, LLC (“**Debtor**”) requests this Court for authority to retain Brown Law Firm, P.C. as its attorney pursuant to 11 U.S.C. § 327 and Bankruptcy Rule 2014. In support, Debtor shows the Court as follows:

1. Debtor filed a Voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code on June 6, 2023, at which time an Order for Relief was entered by the Court.
2. The Debtor manages its financial affairs under the authority of Title 11 of Chapter 11 of the United States Code.
3. Debtor seeks authority to retain Ron D. Brown of the Brown Law Firm, P.C. as its counsel.
4. To facilitate the general administration of this Estate, the services of attorneys are needed to:
 - a. Negotiate allowed claims and treatment of creditors;
 - b. Render legal advice and preparation of legal documents and pleadings concerning claims of creditors, post-petition financing, executing contracts, sale of assets, insurance, etc;
 - c. Represent the Debtor in hearings and other contested matters;
 - d. Formulate a plan of reorganization; and
 - e. All other matters needed for reorganization.
5. Ron D. Brown of the Brown Law Firm, P.C. is well qualified to perform the services of counsel for the Debtor.

6. No member of the Brown Law Firm, P.C. has served as an Examiner in this case.
7. No member of the Brown Law Firm, P.C. holds or represents an interest adverse to the Estate. Furthermore, all members are disinterested persons as defined by 11 U.S.C. Section 101(14).
8. Debtor contends that it is the best interest of this Estate that Ron D. Brown of the Brown Law Firm, P.C. be authorized to act as its attorney.
9. Ron D. Brown of the Brown Law Firm, P.C. was paid \$11,494 (plus reimbursement of wire fees and court filing fees, totaling \$15,000 in sum) pre-petition by Troy Burgess for services rendered before the case was filed for this case and for affiliated case of CSR Worldwide OK, Inc. Case No. [23-80391](#). Debtor has no retainer held in the firm's trust account.
10. The rates to be charged by the Brown Law Firm, P.C. range from \$75.00 an hour for paralegal work, \$250 per hour for associate work and \$350.00 per hour for Ron D. Brown.
11. A Declaration pursuant to Bankruptcy Rule 2014 is attached hereto.

WHEREFORE, CSR-OK Real Estate Holding Company, LLC requests this Court to enter an Order authorizing it to retain Brown Law Firm, P.C. in all matters pertaining to the administration of the Estate, including the matters outlined above.

DATED: June 6, 2023

Respectfully submitted,
Brown Law Firm, P.C., by:

/s/ Ron D. Brown

Ron D. Brown, OBA #16352

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DECLARATION OF ATTORNEY

Ron D. Brown of the Brown Law Firm, P.C. submits this Declaration pursuant to §§ 329 and 524 of the United States Bankruptcy Code and Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure in support of CSR-OK Real Estate Holding Company, LLC's Application for Authority to Retain Counsel for Debtor-in-Possession.

1. I and the members of the Brown Law Firm, P.C. are duly licensed and practicing attorneys in the State of Oklahoma.

2. I performed a conflict check of the creditors of the Debtor. I have determined that Brown Law Firm, P.C. does not represent any creditor in connection with this bankruptcy case.

3. I and the members of Brown Law Firm, P.C. have no connections with the Debtor herein, creditors, or any party in interest, their attorneys and accountants, the United States trustee, or any person employed in the office of the United States Trustee.

4. I and the members of Brown Law Firm, P.C. are disinterested persons in these proceedings and do not represent any interest adverse to this Estate.

I do hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: June 6, 2023

Respectfully submitted,
Brown Law Firm, P.C., by:

/s/ Ron D. Brown

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